

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

PAUL J. McNALLY, as he is TRUSTEE,  
MASSACHUSETTS LABORERS' HEALTH AND  
WELFARE FUND and NEW ENGLAND LABORERS'  
TRAINING TRUST FUND; JAMES MERLONI, JR.,  
as he is TRUSTEE, MASSACHUSETTS LABORERS'  
PENSION FUND and MASSACHUSETTS LEGAL  
SERVICES FUND; MARTIN F. WALSH, as he is  
TRUSTEE, MASSACHUSETTS LABORERS'  
ANNUITY FUND,

Plaintiffs

vs.

BOSTON CHAIN LINK FENCE ERECTORS, INC., and  
its alter ego BOSTON FENCE & SUPPLY, INC.,

Defendants

and

BANK OF AMERICA,

Trustee

C.A. No. 05-10258 NG

**PLAINTIFFS' MOTION FOR EXTENSION OF TIME TO FILE**  
**MOTION FOR ENTRY OF DEFAULT JUDGMENT**

Now come the plaintiffs, Paul McNally, as he is Trustee, Massachusetts Laborers' Health and Welfare Fund, et al (hereinafter, the "Funds"), and respectfully move this honorable Court for an extension of time until September 13, 2005 in which to file Plaintiffs' Motion for Entry of Default Judgment. As grounds therefore, Plaintiffs state as follows:

1. The Plaintiffs have experienced an unanticipated delay in securing the necessary affidavits in support of their Motion.

2. No parties will be harmed by the delay.

WHEREFORE, Plaintiffs seek an extension of time until September 13, 2005 in which to file for Entry of Default Judgment in this matter.

Respectfully submitted,

PAUL J. McNALLY, as he is  
TRUSTEE, MASSACHUSETTS  
LABORERS' HEALTH AND WELFARE  
FUND, et al,

By their attorneys,

/s/ Elizabeth A. Sloane  
Anne R. Sills, Esquire  
BBO #546576  
Elizabeth A. Sloane, Esquire  
BBO#567866  
Segal, Roitman & Coleman  
11 Beacon Street  
Suite #500  
Boston, MA 02108  
(617) 742-0208

Dated: August 23, 2005

### **CERTIFICATE OF SERVICE**

This is to certify that a copy of the above Plaintiffs' Motion for Extension of Time to File Motion for Entry of Default Judgment has been served by certified and first class mail upon the defendants, Boston Chain Link Fence Erectors, Inc. and its alter ego Boston Fence & Supply, Inc. at 128 Newbury Street, West Peabody, MA 01960 this 23<sup>rd</sup> day of August 2005.

/s/ Elizabeth A. Sloane  
Elizabeth A. Sloane, Esquire